

EXHIBIT 21

Barry Gainey

From: Tishyevich, Dmitriy <dmitriy.tishyevich@kirkland.com>
Sent: Wednesday, November 16, 2016 3:09 PM
To: Barry Gainey
Cc: Nicholson, Richard; *mpatunas@patunaslaw.com; Allon, Devora W.
Subject: RE: Ranbaxy Case

Barry, thanks—agree that both sides will use January 1, 2012 as the general start date in responding to interrogatories, while reserving their right to object to time periods more specifically in particular interrogatory responses. With that understanding, we agree that the general objection concerning the time period is no longer in dispute.

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From: Barry Gainey [<mailto:BGainey@gme-law.com>]
Sent: Monday, November 14, 2016 5:18 PM
To: Tishyevich, Dmitriy
Cc: Nicholson, Richard; *mpatunas@patunaslaw.com; Allon, Devora W.
Subject: Ranbaxy Case

Dmitriy:

During our last call about discovery disputes, we discussed the plaintiffs' general objection to the time period described in the defendants' interrogatories to the plaintiffs. It was our position that different time periods could be used for the plaintiffs and the defendants. You disagreed.

After we discussed it further, it was agreed that both sides would use January 1, 2012 as the general start date for the time period that applies to the interrogatories. At the same time, the agreement does not prevent any party from objecting to a specific interrogatory based upon the grounds that, for that interrogatory, the general time period is not relevant to the issues involved in the case. For example, the defendants asked the plaintiffs for information about the plaintiffs' prescriptions for Atorvastatin. For those interrogatories, it is the plaintiffs' position that all prescriptions from January 1, 2012 forward are not relevant. It is plaintiffs' position that prescriptions for Atorvastatin that pre-date when the recalled pills were first distributed by the defendants are not relevant in any way. (Similarly, it is plaintiffs position that prescriptions for Atorvastatin made by other manufacturers are not relevant in any way regardless of the date the prescription was filled.)

So, to summarize, the parties have agreed to use January 1, 2012 as a general start date but have also preserved their rights to object to specific interrogatories on time related issues.

In light of this agreement, I believe that our general objection concerning the time period is no longer in dispute. Please confirm that you agree.

Thank you.

BG

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